NO. 96781-7

SUPREME COURT OF THE STATE OF WASHINGTON

CITY OF SEATTLE,

and

UNITE HERE! LOCAL 8; SEATTLE PROTECTS WOMEN,

Petitioners,

v.

AMERICAN HOTEL & LODGING ASSOCIATION, SEATTLE HOTEL ASSOCIATION, and WASHINGTON HOSPITALITY ASSOCIATION,

Respondents.

AMICUS BRIEF OF THE STATE OF WASHINGTON

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I. INTRODUCTION

Voters and elected legislative bodies often seek to address complex issues through comprehensive legislation. Nothing in this Court's precedent outlaws that approach or requires piecemeal legislation. Rather, the single-subject rule allows a measure to be drafted broadly and include numerous and varied provisions as long as each provision is germane to the overarching subject of the measure and to the other provisions.

Local Initiative 124 (I-124) complies with this Court's single-subject jurisprudence because it comprehensively addresses multiple aspects of one general subject: hotel employee working conditions. While I-124 addresses worker safety, access to health care, and job security, all of these subtopics are rationally related to I-124's general purpose of improving hotel employee working conditions, and, likewise, to one another. This Court should reverse the Court of Appeals and affirm the people's and legislative bodies' ability to address multiple aspects of the same issue through rationally unified measures.

II. IDENTITY AND INTEREST OF AMICUS

Although this appeal concerns the validity of a local initiative, Amicus Curiae State of Washington is interested for at least two reasons.

First, the State has an interest in the health, safety, and well-being of its residents, which this local initiative aims to promote. *See Rousso v. State*, 170 Wn.2d 70, 83, 239 P.3d 1084 (2010) (recognizing "substantial state interest" in protecting "the health, welfare, safety, and morals of its citizens").

Second, the State has an interest in the sound construction of the Washington Constitution. Similar to the Seattle City Charter restriction at issue in this case, article II, section 19 of the Washington Constitution limits statewide legislation and initiatives to a single subject. Whether this Court applies that provision to state legislation or a local charter provision to local legislation, the analysis is similar, so the final decision in this case will likely add to the body of precedent that governs measures enacted by the legislature or by the people through state initiative. *See, e.g.*, *Filo Foods, LLC v. City of SeaTac*, 183 Wn.2d 770, 781-82, 357 P.3d 1040 (2015) (applying cases analyzing article II, section 19 to single-subject limitation in RCW 35A.12.130).

III. ISSUE ADDRESSED BY AMICUS

The State will address whether local I-124, which comprehensively addresses health, safety, and labor standards for hotel workers, complies

with the single-subject limitation as interpreted and applied by this Court in similar challenges.[1]

IV. STATEMENT OF THE CASE

Seattle voters approved I-124 at the 2016 general election, broadly addressing the working conditions of Seattle hotel employees. *Am. Hotel & Lodging Ass'n v. City of Seattle*, 6 Wn. App. 2d 928, 932, 432 P.3d 434 (2018); Seattle Municipal Code (SMC) 14.25.[2] As explained in its ballot title, I-124 comprehensively provides health, safety, and labor standards for hotel employees. CP 75. Specifically, it requires employers to provide certain protections from assault, sexual harassment, and injury; limit workloads; provide access to healthcare; and provide limited job security measures when hotels change ownership. CP 75.

Three associations representing hotel owners brought this action in the King County Superior Court, arguing, among other things, that I-124 embraced more than one subject. CP 1-9. The superior court upheld the initiative. CP 333-70. The Court of Appeals reversed on single-subject grounds, holding that although the various subdivisions of I-124 fell

[1] The State agrees with Petitioners that RCW 35A.12.130 is not applicable, and Respondents do not appear to contend otherwise.

[2] SMC 14.25 is attached to the City of Seattle's Supplemental Brief as Appendix A.

within the scope of the measure's general ballot title, *Am. Hotel & Lodging Ass'n*, 6 Wn. App. 2d at 941, they lacked rational unity amongst themselves. *Id*. at 949. This Court granted discretionary review.

V. ANALYSIS

The purpose of the single-subject requirement is to "prevent the grouping of *incompatible* measures" and "to prevent 'logrolling,' which occurs when a measure is drafted such that a legislator or voter may be required to vote for something of which he or she disapproves in order to secure approval of an *unrelated* law." *Wash. Ass'n for Substance Abuse & Violence Prevention v. State* (*WASAVP*), 174 Wn.2d 642, 655, 278 P.3d 632 (2012) (emphases added). As explained below, there is no such concern here, where all of the provisions of I-124 are compatible with each other and relate to I-124's comprehensive purpose to improve working conditions for Seattle hotel employees.

The Court of Appeals applied the single-subject rule in a constricted way that would restrict the ability of legislators and the public to address multi-faceted problems through collective legislative treatment. While the single-subject limitation "was intended to prevent" legislation from embracing "wholly unrelated subjects[,] it was not intended to prevent the enactment of a complete law on a given subject, even though

the provisions of the law may be numerous and varied." *Casco Co. v. Pub. Util. Dist. 1*, 37 Wn.2d 777, 791, 226 P.2d 235 (1951); *cf. Chiyoko Ikuta v. Shunji K. Ikuta*, 97 Cal. App. 2d 787, 792, 218 P.2d 854 (1950) (holding California Constitution's single-subject limitation "does not compel piecemeal legislation"). A legislative body "'in each case has the right to determine for itself how comprehensive shall be the object of the statute.'" *WASAVP*, 174 Wn.2d at 655 (quoting *Gruen v. State Tax Comm'n*, 35 Wn.2d 1, 22, 211 P.2d 651 (1949), *overruled in part on other grounds by State ex rel. Wash. State Fin. Comm. v. Martin*, 62 Wn.2d 645, 384 P.2d 833 (1963)). If legislation cannot collectively address various aspects of a single subject, legislative bodies would essentially be forced to do so only through multiple acts, with potential risks to effective policy-making.

Here, as explained in more detail below, the drafters of I-124 chose to comprehensively address multiple aspects of hotel employee working conditions, and Seattle voters were appropriately put on notice of that intent by the general ballot title accompanying the measure.

A. I-124 Generally Addresses Working Conditions Impacting the Health and Well-Being of Hotel Employees

Analysis of a single-subject challenge to an initiative begins with a determination of whether the ballot title is general or restrictive. *Filo Foods*, 183 Wn.2d at 782. The ballot title "consists of a statement of the subject of

the measure, a concise description of the measure, and the question of whether or not the measure should be enacted into law." *WASAVP*, 174 Wn.2d at 655. "When a ballot title 'suggests a general, overarching subject matter for the initiative,'" it is general. *Filo Foods*, 183 Wn.2d at 782 (quoting *Wash. Ass'n of Neigh. Stores v. State*, 149 Wn.2d 359, 369, 70 P.3d 920 (2003)).

The drafters of a measure have "'the right to determine for [themselves] how comprehensive shall be the object of the statute.'" *WASAVP*, 174 Wn.2d at 655 (quoting *Gruen*, 35 Wn.2d at 22); *see also Kueckelhan v. Fed. Old Line Ins. Co.*, 69 Wn.2d 392, 403, 418 P.2d 443 (1966) (holding measure's drafter "is deemed the judge of the scope which it will give to the word 'subject'"). As such, the single-subject limitation should not be construed "to impose awkward and hampering restrictions[.]" *Kueckelhan*, 69 Wn.2d at 403. Rather, the drafter has the latitude to establish the breadth and substance of a measure's "subjects" for "convenience of treatment" and "greater effectiveness in attaining the general purpose of the particular" measure. *WASAVP*, 174 Wn.2d at 656 (internal quotation marks omitted).

Here, I-124's ballot title reflects its general purpose to address working conditions impacting the health and well-being of a particular class of workers: "Initiative 124 concerns health, safety, and labor standards for

Seattle hotel employees." CP 75; *see Filo Foods*, 183 Wn.2d at 784-85 (recognizing general purpose of similar initiative to address "labor standards for certain employees"). Indeed, the Court of Appeals found that while the measure "does carve out for regulation a specific risk hotel workers confront," the "balance of the title broadens its scope to cover more general working conditions—'improv[ing] access to healthcare; limit[ing] workloads; and provid[ing] limited job security.'" *Am. Hotel & Lodging Ass'n*, 6 Wn. App. 2d at 941 (alterations in original). Thus, the Court of Appeals correctly concluded, the "overall tenor" of the ballot title of I-124 is "general in nature." *See id*. The hotel associations have not asked this Court to review that determination.

B. There is Rational Unity Between the General Subject of I-124 and its Subdivisions

Where a ballot title is classified as general, "great liberality will be indulged to hold that any subject reasonably germane to such title may be embraced." *Filo Foods*, 183 Wn.2d at 782 (internal quotation marks omitted) (quoting *Amalgamated Transit Union Local 587 v. State*, 142 Wn.2d 183, 207, 11 P.3d 762, 27 P.3d 608 (2000) (quoting *DeCano v. State*, 7 Wn.2d 613, 627, 110 P.2d 627 (1941))). There is no violation of the single-subject requirement "even if a general subject contains several incidental subjects or subdivisions." *WASAVP*, 174 Wn.2d at 656. In such

cases, "[a]ll that is required" is that "there be some rational unity between the general subject and the incidental subdivisions." *WASAVP*, 174 Wn.2d at 656 (alteration in original) (internal quotation marks omitted). "Rational unity" turns on "whether the matters within the body of the initiative are germane to the general title and whether they are germane to one another." *Id.* (internal quotation marks omitted). Here, each of I-124's subdivisions is germane to the overarching purpose and effect of the measure to address hotel employee working conditions. Accordingly, they are each germane to the title and to each other.

1. The matters within the body of I-124 are germane to its general title

It is undisputed that each of I-124's provisions is related to the comprehensive purpose of the initiative, which is to further the health and well-being of a certain class of workers by providing "health, safety and labor standards for Seattle hotel employees." *Am. Hotel & Lodging Ass'n*, 6 Wn. App. 2d at 932 (quoting ballot title). The Court of Appeals held as much, and the hotel associations do not contend otherwise. *See id*. at 942. Thus, there is no disagreement that there is rational unity between the general title of I-124 and its specific provisions. *Id*.

2. The matters within I-124 are germane to each other

Because the individual sections of I-124 are each germane to the initiative's overall purpose to improve working conditions for hotel employees and congruent with one another, they are also germane to each other.

a. The sections of I-124 each relate to the initiative's general purpose and are congruent with each other

The single-subject restriction was never intended to "prevent the enactment of a complete law on a given subject, even though the provisions of the law may be numerous and varied." *Casco Co.*, 37 Wn.2d at 791 (quoting *McQueen v. Kittitas Cty.*, 115 Wash. 672, 682, 198 P. 394 (1921)). As such, "matters which apparently constitute distinct and separate subjects are not so where they are not incongruous and diverse to each other." *Id*. (quoting 50 Am. Jur. *Statutes* § 197). Rather, a law "may include every matter germane, referable, auxiliary, incidental, or subsidiary to, and not inconsistent with, or foreign to, the general subject or object of the act." *Id*.; *see also Kueckelhan*, 69 Wn.2d at 403-04 (finding rational unity between provisions creating office of fire marshal, office of insurance commissioner, and creation of insurance code).

As this Court noted in *Amalgamated Transit*: "It is hardly necessary to suggest that matters which ordinarily would not be thought to have any

common features or characteristics might, for purposes of legislative treatment, be grouped together and treated as one subject." *Amalgamated Transit*, 142 Wn.2d at 209 (quoting *State ex rel. Wash. Toll Bridge Auth. v. Yelle*, 61 Wn.2d 28, 33, 377 P.2d 466 (1962)). Thus, the "subjects" for purposes of a single-subject analysis are "'the result of classification for convenience of treatment and for greater effectiveness in attaining the general purpose of the particular legislative act[.]'" *Id*. (quoting *Yelle*, 61 Wn.2d at 33 (quoting *State ex rel. Test v. Steinwedel*, 203 Ind. 457, 467, 180 N.E. 865 (1932))).

With respect to I-124, as explained above, each provision is related to the shared purpose of improving working conditions affecting the health, safety, and well-being of hotel employees. Thus, they rationally relate to both the general purpose of the measure and to each other. Moreover, there is nothing "incongruous" between making sure there are measures in place to protect hotel employees from workplace harms, including those committed by hotel guests, and providing those same employees with improved access to medical care. Likewise, there is nothing inconsistent with either of those conditions and providing hotel employees with a small modicum of job security to maintain continuity of their well-being in the

event of a change of ownership. In fact, all of these provisions are related to each other because they all constitute working conditions impacting the health and well-being of hotel employees. Because each subpart is consistent with one another and germane to the general object of I-124, there is no single-subject problem here.

I-124 is similar to the measure upheld in *Filo Foods*, 183 Wn.2d at 784-85. There, this Court concluded that the general purpose of Proposition 1 was "concern[ing] labor standards for certain employers," and the individual sub-parts providing for a minimum wage, paid sick and safe time,[3] and a 90-day employee retention policy imposed on successor employers were "reasonably germane" to each other and the general purpose of the measure. *Id*. This Court did not address at length whether the requirement to implement a successive employment retention policy was sufficiently related to providing a minimum wage, because both "concern[ed] labor standards," and were "reasonably germane to the establishment of minimum employee benefits[.]" *Id*.

[3] "Paid sick and safe time" refers to paid leave for circumstances relating to illness, injury, closure of place of business for health-related reasons, school closures for health-related reasons, domestic violence, sexual assault, and stalking. *See, e.g.*, SMC 14.16.030.

Despite I-124's strong similarities to the measure at issue in *Filo Foods*, the Court of Appeals decided I-124 was more similar to the measures at issue in *Amalgamated Transit*, *Belas v. Kiga*, 135 Wn.2d 913, 959 P.2d 1037 (1998), and *Lee v. State*, 185 Wn.2d 608, 374 P.3d 157 (2016). *Am. Hotel & Lodging Ass'n*, 6 Wn. App. 2d at 942. Those cases are distinguishable. This Court has separated out *Amalgamated Transit* and *Kiga* from the rest of its single-subject jurisprudence on the basis that the measures at issue in those cases contained "two subjects, where one [was] more broad and long term than the other." *Citizens for Responsible Wildlife Mgmt. v. State*, 149 Wn.2d 622, 638-39, 71 P.3d 644 (2003); *see also WASAVP*, 174 Wn.2d at 659 ("[U]nlike the subjects at issue in *Amalgamated Transit* and *Kiga*, I-1183's changes to the regulation of spirits and wine do not combine a specific impact of a law with a general measure for the future."). Similarly, the Court found the measure in *Lee* different because it combined "the reduction of the current sales tax rate and a permanent change to the constitution or to the method for approving all future taxes and fees set forth by I-1366." *Lee*, 185 Wn.2d at 622-23. Thus, the Court in *Lee* concluded, I-1366 was invalid for the same reasons expressed in *Amalgamated Transit* and *Kiga*. *Id.*

In contrast to the measures invalidated in *Amalgamated Transit*, *Kiga*, and *Lee*, I-124 does not attempt to combine specific, short-term solutions with expansive, permanent changes. Rather, like the measure at issue in *Filo Foods*, I-124 prospectively and broadly addresses working conditions applicable to a specific class of employees. Since each provision is rationally related to that shared purpose, and, moreover, congruent, they are rationally related to each other.

b. The Court of Appeals erred in imposing additional requirements that exceed this Court's rational unity test

While the Court of Appeals acknowledged that each of the individual provisions of I-124 was rationally related to the initiative's general purpose, and thus rationally related to each other in that sense, it went on to decide that there was no unity amongst the separate "operative provisions" and "purposes" of each sub-part. *Am. Hotel & Lodging Ass'n*, 6 Wn. App. 2d at 942. The Court of Appeals also found it significant that none of the provisions depended on each other. *Id*. at 944. In so holding, the Court of Appeals took an overly restrictive approach that is contrary to this Court's single-subject case law, unduly emphasizing the number of sub-parts of the initiative and each sub-part's independence, rather than their relation to the measure's undisputed, overarching purpose.

First, as described above, the relevant test is whether each subpart of a general measure is rationally related to the general purpose of the measure and to the other subparts. *WASAVP*, 174 Wn.2d at 656. When a measure has a general subject, this is not an overly difficult test to meet. *Id.* ("Where a title is general, *all that is required* . . . is that there be some rational unity between the general subject and the incidental subdivisions." (emphasis added) (internal quotation marks omitted)). Thus, to violate this rule, "an act must embrace two or more *dissimilar and discordant* subjects, that by no fair intendment can be considered as having *any legitimate connection with or relation* to each other." *Casco Co.*, 37 Wn.2d at 790-91 (emphases added) (quoting 50 Am. Jur. *Statutes* § 197).

Consistent with that approach, this Court concluded in *WASAVP* that the various parts of an initiative providing for the privatization of liquor sales, which included provisions for the closing of state liquor stores, selling their assets, licensing private parties to sell liquor, setting fees, earmarking funds for general public safety, modifying advertising rules, and regulating the privatized industry, were appropriately addressed together, given that they all related to liquor sales. *WASAVP*, 174 Wn.2d at 647, 656, 659. Naturally, one could imagine that the provision providing for earmarking funds for general public safety might have had a different operative provision and sub-purpose than closing state liquor stores, but that was not

the test for whether each provision bore rational unity to the others. *See id*. at 658-59. The relevant question was whether the individual provisions were "germane to the general subject of I-1183, as well as to the individual provisions of the initiative," not whether each subsection of the initiative had a similar operative provision or additional sub-purpose. *Id*. at 659.

Similarly, in *Fritz v. Gorton*, 83 Wn.2d 275, 289-90, 517 P.2d 911 (1974) (plurality), this Court rejected a single-subject challenge to Initiative 276, even though it had varying subparts, each of which could be ascribed a more specific operative provision or purpose.[4] Initiative 276 created the Public Disclosure Commission, required financial reporting by political candidates, imposed campaign spending limits, required disclosure of public records by state and local government agencies, and created a cause of action for enforcement of public disclosure requirements, among other things. *Id.* Even though there was likely a different operative provision and purpose for imposing campaign spending limits than there was for requiring agencies to provide access to public records, the Court found that all of the

[4] The lead opinion in *Fritz* first concluded that article II, section 19 did not apply to initiatives of the people, but went on to analyze the constitutionality of Initiative 276 as though it did. *Fritz*, 83 Wn.2d at 289. As the Court later noted in *Washington Federation of State Employees v. State*, 127 Wn.2d 544, 551-53, 901 P.2d 1028 (1995), a "majority of the court" in *Fritz* concluded that article II, section 19 did so apply. The Court in *Washington Federation of State Employees* applied article II, section 19 to an initiative, concluding that "a general title consisting of a few well-chosen words, suggesting the general subject stated, is all that is necessary to comply with the constitutional provision." *Id*. at 554.

provisions of Initiative 276 bore a "close interrelationship to the dominant intendment of the measure," which was "openness in government." *Fritz*, 83 Wn.2d at 290. The Court did not impose on the drafters of that initiative the additional requirement that each subsection have a sub-purpose that was the same or similar to every other subsection's more specific sub-purpose, or that the operative provision of each subdivision be similar to that of the others. *Id.* at 289-90.

Of course, there will often be different operative provisions and purposes behind different subdivisions of a broad, comprehensive measure, but this Court has recognized that the people and legislative bodies have the prerogative to determine how comprehensive a measure will be. *WASAVP*, 174 Wn.2d at 655. The people or legislative bodies "'may adopt just as comprehensive a title as [they] see[ ] fit, and if such title when taken by itself relates to a unified subject or object, it is good, however much such unified subject is capable of division.'" *Casco Co.*, 37 Wn.2d at 789 (quoting *Marston v. Humes*, 3 Wash. 267, 276, 28 P. 520 (1891)).

In this case, the Court of Appeals acknowledged that each subdivision of I-124 was rationally related to the general subject of hotel employee working conditions and "'may facilitate' the 'health, safety and labor conditions' of certain hotel workers." *Am. Hotel & Lodging Ass'n*, 6 Wn. App. 2d at 942. That finding should have resulted, under this Court's

precedent, in a conclusion that the measure complied with the single-subject requirement. *See, e.g., Casco Co.*, 37 Wn.2d at 791; *WASAVP*, 174 Wn.2d at 656. Yet the Court of Appeals added an additional requirement that the "operative provision" of each subdivision have an *additional* purpose that must relate to the purpose of every other subdivision, beyond its relation to the general purpose of the measure as a whole. *Am. Hotel & Lodging Ass'n*, 6 Wn. App. 2d at 942. As explained above, this additional requirement is absent from this Court's single-subject jurisprudence. The relevant question is whether each provision is rationally related to the others. *WASAVP*, 174 Wn.2d at 656. This inquiry is satisfied where, as here, each provision shares a common objective.

Second, to the extent the Court of Appeals relied on its conclusion that "none of the first four parts of I-124 are necessary to implement any other part of the initiative" as a basis for finding rational unity lacking, it also erred. *See Am. Hotel & Lodging Ass'n*, 6 Wn. App. 2d at 944-46. As the Court of Appeals itself acknowledged, subparts of a measure need not be "necessary to implement each other" in order to be "germane to one another." *Id*. Indeed, this Court has explicitly rejected that argument. *Citizens for Responsible Wildlife Mgmt.*, 149 Wn.2d at 638.

In sum, all of the provisions of I-124 serve its overarching purpose to positively impact working conditions of hotel employees. I-124 complies

with the single-subject requirement because each of its provisions is rationally related to that purpose and congruent with every other provision.

VI. CONCLUSION

For these reasons, and for the reasons articulated by the Petitioners, this Court should reverse the Court of Appeals' decision.

RESPECTFULLY SUBMITTED this 2nd day of August 2019.

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CERTIFICATE OF SERVICE

I certify, under penalty of perjury under the laws of the state of Washington, that on this date I have caused a true and correct copy of the Amicus Brief Of The State Of Washington to be served on the following via the Court's electronic filing system as well as a .pdf version to the listed e-mails:

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